REMARKS

Reconsideration of the application is requested.

Claims 1-14 are now in the application. Claims 1-14 are subject to examination. Claims 12-14 have been added.

Under the heading "Claim Rejections – 35 USC § 103" on page 2 of the above-identified Office Action, claims 1-11 have been rejected as being obvious over Applicant's Admitted Prior Art in view of U.S. Patent No. 6,275,498 B1 to Bisceglia under 35 U.S.C. § 103. Applicant respectfully traverses.

Claims 1 and 11 specify that data packets are interchanged by radio between said primary terminal and:

said first group of secondary terminals with a first Bluetooth address BD_ADDR of said primary terminal being used for connection identification; and

said second group of said secondary terminals with a second Bluetooth address BD_ADDR of said primary terminal being used for connection identification.

In other words, the primary terminal is identified with two Bluetooth addresses. Applicant first of all points out that the Bluetooth standard requires using only

one address to identify a primary terminal. Secondly, the Bluetooth standard
does not support using two addresses to identify a primary terminal. Applicant
asserts that it simply would not have been obvious use two different Bluetooth
addresses to identify a primary terminal because the Bluetooth standard
specifically requires using only one address and because the Bluetooth
standard does not support using two addresses. The Examiner has not
identified any teaching in the prior art that would have motivated one of
ordinary skill in the art to: 1) ignore the requirements of the Bluetooth standard
that require the use of only one identification address; and 2) modify the
operation of a Bluetooth device so that two Bluetooth addresses can be used to
identify a single device.

Bisceglia does not provide a suggestion to ignore the requirements imposed by
a communication standard because the communication standard used in
Bisceglia actually supports using multiple addresses to identify devices,
whereas in contrast, the Bluetooth standard does not support identifying a
single device with multiple addresses.

Bisceglia does not teach or suggest using multiple addresses with a
communication standard, such as Bluetooth, which does not support the use of
multiple addresses for connection identification. Therefore, applicant asserts
that the prior art simply does not teach or suggest providing a primary terminal
with a second Bluetooth address BD_ADDR for connection identification when

the Bluetooth communication standard <u>does not support</u> the use of multiple

addresses for connection identification.

Furthermore, the admitted prior art relates to transmission by radio, whereas

Bisceglia does not in any way relate to radio transmission or to the Bluetooth

standard in particular. Applicant asserts that Bisceglia does not provide a

suggestion to modify a radio transmission system, such as that discussed in

the admitted prior art. The claimed invention is not obvious over the cited prior

art.

Let us now review the standard for determining obviousness as set forth in the

MPEP. MPEP 2141 Section II sets forth the Graham Factual Inquiries that are

used to determine obviousness under 35 U.S.C. 103. This section is copied

below:

> II. BASIC CONSIDERATIONS WHICH APPLY TO
> OBVIOUSNESS REJECTIONS
>
> When applying 35 U.S.C. 103, the following tenets of patent law
> must be adhered to:
>
> (A) The claimed invention must be considered as a whole;
>
> (B) The references must be considered as a whole and must
>
> suggest the desirability and thus the obviousness of making the
>
> combination;

(C) The references must be viewed without the benefit of

impermissible hindsight vision afforded by the claimed invention;

and

(D) Reasonable expectation of success is the standard with which

obviousness is determined.

Applicant respectfully asserts that when Applicant's Admitted Prior Art

and the teaching in Bisceglia are considered as a whole as required by

tenet (B), they do not suggest the desirability of making the combination

and they do not make such a combination obvious.

The Examiner has correctly recognized that Applicant's Admitted Prior Art

discloses a data transmission system based on the Bluetooth standard. The

Examiner, however, is of the opinion that it was obvious to modify the prior art

Bluetooth data transmission system to obtain a data transmission system with

the additional feature:

a second group of said secondary terminals, data packets being

interchanged by radio between said primary terminal and said second

group of said secondary terminals with a second Bluetooth address

BD_ADDR of said primary terminal being used for connection

identification.

Applicant respectfully disagrees with the opinion of the Examiner and argues

that when one of ordinary skill in the art is working with a data transmission

System based <u>on the Bluetooth standard,</u> they simply would not have obtained

a suggestion to include the feature of claim 1, which is copied above, in the

system disclosed in Applicant's Admitted Prior Art.

The first and second addresses BD_ADDR as required by currently amended

claim 1 correspond to 48-bit addresses BD_ADDR (See BD_ADDR in Fig. 1)

according to the Bluetooth standard that uniquely identify a Bluetooth device.

Applicant points out that the term BD_ADDR is defined in the Bluetooth

standard. This means that according to the prior art, each Bluetooth device

has its own truly unique 48-bit address BD_ADDR that cannot be modified by

the user of the Bluetooth device. The Bluetooth standard requires this

assignment of a unique address BD_ADDR to an individual Bluetooth device.

In order to conform with the Bluetooth standard, one of ordinary skill in the art

uses only a single address BD_ADDR for each individual Bluetooth device.

In contrast to this prior art Bluetooth system, the invention defined by claim 1

requires the use of a second address BD_ADDR for connection identification

during an interchange of data packets between the primary terminal and a

second group of secondary terminals. This idea of using a second address

BD_ADDR contradicts the Bluetooth standard, since this standard insists on

<u>using only one address</u> BD_ADDR. Accordingly, by taking into account only

the technical teaching of the prior art, one of ordinary skill in the art is not

motivated to use a second address BD_ADDR for connection identification as

required by claim 1.

Furthermore, the teaching in Bisceglia et al. relates to communication systems in which using multiple addresses is supported by the underlying communication standards. It should be evident that employing a second address in a system supporting using multiple addresses does not provide any suggestion or motivation to use a second address in a system that does not support using multiple addresses.

Again, applicant asserts that the prior art simply does not teach or suggest providing a primary terminal with a second Bluetooth address BD_ADDR for connection identification when the Bluetooth communication standard does not support the use of multiple addresses for connection identification.

Claim 11 includes a primary terminal having a first Bluetooth address BD_ADDR for wirelessly interchanging data packets with a first group of secondary terminals and a second Bluetooth address BD_ADDR for wirelessly interchanging data packets with a second group of secondary terminals. From the discussion above, it should be clear that the invention as defined by claim 11 is also not suggested by the prior art.

Claims 12-14 have been added to even further distinguish the invention from the prior art. Support for added claims 12-14 can be found by referring to claim

1 and to the specification at page 3, lines 16-12 and page 6, lines 13-24, for example.

The arguments given above with regard to claim 1 also apply to claim 12. Claim 12, however, additionally species that the first Bluetooth address BD_ADDR and the second Bluetooth address BD_ADDR differ in at least one bit of a lower address part LAP.

With regard to using a bit in the lower address part LAP to establish a difference between the first and the second address, the Examiner argues (cf, page 4 of the Office Action):

> "… it would have been obvious matter of design choice to place the at least one bit in the least significant bit position, or any other bit position in the LAP filed <u>with the exception of those that are reserved by the Bluetooth standard</u> …" .

In response to this statement, it is noted that one of ordinary skill in the art is familiar with the fact that the 24 bits of the LAP are assigned by the manufacturer of the Bluetooth device. Accordingly, <u>the Bluetooth Standard reserves all bit positions of the LAP</u>. For this reason, the Bluetooth standard itself rules out using a bit in the LAP to distinguish between different addresses identifying a primary terminal. This is exactly the reason why the Bluetooth Standard itself (i.e. the AAPA) does not motivate one of ordinary skill in the art to extend the AAPA by using the above-cited feature of claim 12. Moreover,

even is using different addresses for only one device is known from the

teaching of Bisceglia, one of ordinary skill in the art would not be motivated to

employ a second address within the framework of the Bluetooth standard.

The invention as defined by claims 12-14 is not suggested by the prior art. For

similar reasons, the invention as defined by claims 2-4, and 10 is also not

suggested.

It is accordingly believed to be clear that none of the references, whether taken

alone or in any combination, either show or suggest the features of claims 1,

11, or 12. Claims 1, 11, and 12 are, therefore, believed to be patentable over

the art. The dependent claims are believed to be patentable as well because

they all are ultimately dependent on claims 1 or 12.

In view of the foregoing, reconsideration and allowance of claims 1-14 are

solicited.

In the event the Examiner should still find any of the claims to be unpatentable,

counsel would appreciate receiving a telephone call so that, if possible,

patentable language can be worked out.

Please charge any fees that might be due with respect to Sections 1.16 and

1.17 to the Deposit Account of Lerner Greenberg Stemer LLP, No. 12-1099.

Respectfully submitted,

/Werner H. Stemer/
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